

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

NORMAN L. SCOTT, SR.,

Plaintiff,

v.

POLICE AND FIRE FEDERAL

CREDIT UNION,

Defendant.,

No.: 1:22-cv-00988-KMW-SAK

**AMENDED COMPLAINT AND
JURY TRIAL DEMANDED**

R E C E I V E D

OCT 28 2022

AT 8:30 _____ M
WILLIAM J. FISH
CLERK

COMPLAINT

Plaintiff, Norman L. Scott, pro se, demands judgement against Defendant, equitable, injunctive, actual, and compensatory, statutory, treble and/ or punitive damages, and/or other relief, upon a cause of action, hereby avers as follows:

INTRODUCTION

1. This action is being initiated by Plaintiff against Police and Fire Federal Credit Union (hereinafter to as "Defendant") for violation of the Civil Rights Act of 1964, New Jersey Law against Discrimination (LAD). Plaintiff asserts, *inter alia*, that he experienced unlawful public accommodation discrimination. Plaintiff allege that Defendant has engaged in, and continues to engage in, a company-wide pattern and practice of discrimination, both intentional and systemic, based on

race, national origin, and sex. As a direct consequence of Defendant's unlawful actions, Plaintiff seeks damages as set forth herein.

JURISDICTION AND VENUE

2. This Court has original subject matter jurisdiction over the instant action pursuant to 28 U.S.C. §§1331 and civil rights act of 1964 because it arises under laws of the United States and seeks redress for violation of Civil Rights act of 1964.

PARTIES

3. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.
4. Plaintiff is an adult individual, with an address of (1175 Marlkrass, #3658 RD Cherry Hill, NJ 08034).
5. Plaintiff is an African American Male from the continent of Africa national origin, and in a protected class.
6. Defendant Police and Fire Federal Credit Union with an address of (901 Arch Street, Philadelphia, PA 19107).
7. At all times relevant herein, Defendant acted by and through its agents, servants and/or employees, each of whom always acted relevant herein in the course and scope of their employment with and for the Defendant.

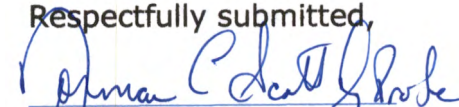
First Cause of Action
Violation of the Civil Rights Act of 1964
Discrimination in Places of Public Accommodation

8. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.
9. Defendant's failure to accommodate the Plaintiff at the Moorestown mall branch.
10. Defendant failed to provide cash advance services to Plaintiff due to his race.
11. Defendant's failure to provide services has caused him damages and injuries.
12. Plaintiff was subjected to public discrimination through disparate treatment, pretextual admonishment, and demeaning and/or discriminatory treatment towards him.

WHEREFORE, Plaintiff prays that this Court enter an Order providing that:

- A. Plaintiff is to be accorded any, and all other equitable and legal relief as the Court deems just, proper, and appropriate including emotional distress.
- B. Award compensatory damages to Plaintiff for his injuries, pain, and suffering caused by Defendant's discriminatory conduct, pursuant to and within the statutory limitation of Civil Rights Act of 1964.
- C. Plaintiff suffered emotional distress from the public discrimination by the Defendant on the 13th day of August 2021.
- D. Plaintiff's claims are to receive a trial by jury to the extent allowed by applicable law.

Dated: October 28, 2022

Respectfully submitted,

Norman L. Scott, SR., pro se

**UNITED STATES DISTRICT COURT
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NORMAN L. SCOTT, SR.,

No.: 1:22-cv-00988-KMW-SAK

Plaintiff, :

v. :

CERTIFICATION OF SERVICE

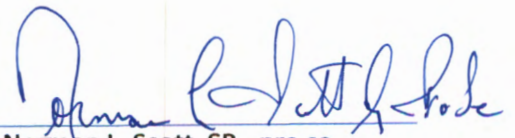
POLICE AND FIRE FEDERAL
CREDIT UNION,

Defendant.

I certify that I caused a copy of the **Amended Complaint**, and certification of Service in this matter to be filed with the Clerk of the United States District Court, District of New Jersey and that a copy of these documents will also be sent by first class mail to the Defendant:

Silvio A. Trentalange, Esquire
Dilworth Paxson LLP
1500 Market Street, Suite 3500E
Philadelphia, PA 19102

Dated: October 28, 2022



Norman L. Scott, SR., pro se

1175 Marlkrass RD, #3658

Cherry Hill, NJ 08034

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